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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

GROUND FISH FORUM, INC.,

Plaintiff,

v.

NATIONAL MARINE FISHERIES
SERVICE; NATIONAL OCEANIC AND
ATMOSPHERIC ADMINISTRATION;
GINA RAIMONDO, in her official capacity
as the United States Secretary of Commerce;
and JANET COIT, in her official capacity as
Assistant Administrator, National Oceanic
and Atmospheric Administration,

Defendants.

Case No. 3:23-cv-00283-JMK

**DECLARATION OF RYAN P. STEEN IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO MOTION TO EXTEND BRIEFING DEADLINES**

I, Ryan P. Steen, hereby declare as follows:

1. I am an attorney with the law firm of Stoel Rives LLP, counsel for Plaintiff Groundfish Forum, Inc. (“Plaintiff”) in the above-captioned matter. This declaration is based on my personal knowledge and is made in support of Plaintiff’s Opposition to Defendants’ Motion to Extend Briefing Deadlines (“Motion”).

2. After Federal Defendants did not move for reconsideration of the Court’s Administrative Appeal Scheduling Order (“Scheduling Order”) and after Intervenor-Defendants committed to abide by the Scheduling Order, my co-counsel—Jason Morgan and Connor Smith—and I each scheduled vacations in July, 2024. Specifically, I will be on vacation with my family on July 1, 2, and 5; Mr. Morgan will be on vacation with his family on July 8-12; and Mr. Smith will be on vacation with his family on July 3-9 and July 17-21. These vacations were scheduled in reliance, in part, on the Court’s Scheduling Order. I communicated Plaintiff’s counsel’s vacation obligations to Federal Defendants’ counsel before the Motion was filed.

3. Federal Defendants have requested a reply briefing period for Plaintiff of June 27 to July 11—a 14-day period of time when all three of Plaintiff’s counsel are gone for at least a significant part of the time and when a major federal holiday occurs. To have sufficient time to prepare reply briefs in response to two 25-page briefs, Plaintiff’s counsel would, at a minimum, need to request a routine 14-day extension and perhaps a longer extension given the absence of counsel during the first portion of an extended reply briefing period. Counsel must prepare draft briefs early enough in a briefing period

to allow adequate time for client review and subsequent revisions before the brief is finalized and filed.

4. Attached as Exhibit A to this declaration is a true and correct copy of emails exchanges between John Fortuna, counsel for Intervenor-Defendants in the above-captioned matter, and myself.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 10, 2024.

STOEL RIVES LLP

By: /s/ Ryan P. Steen
Ryan P. Steen, Bar No. 0912084
ryan.steen@stoel.com

*Attorneys for Plaintiff Groundfish Forum,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2024, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court of Alaska by using the CM/ECF system. Participants in Case No. 3:23-cv-00283-JMK who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Ryan P. Steen

Ryan P. Steen

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